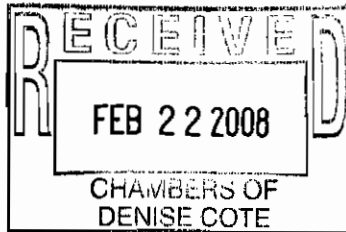


LAW OFFICES
NELLY STOTLAND & ASSOCIATES P.C.

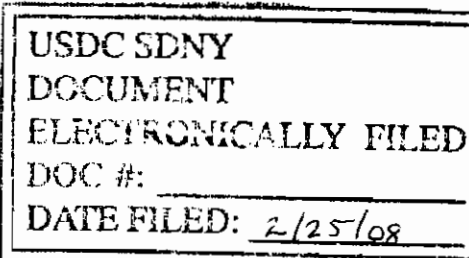
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MEMO ENDORSED

Honorable Denise Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007



February 19, 2008



Re: Polanco v. Kim
Docket Number: 07CV7700 (DLC)(KNF)

Dear Honorable Cote:

I am attorneys for the plaintiffs Edy and Fatima Polanco in the above captioned action. I am writing with regard to outstanding discovery that is owed by the defendant with regard to this matter. Defendant has failed to comply with plaintiff's discovery demands, which are now due and owing. Pursuant to your Honor's Rules and local Civil Rule 37.2, I request a conference for leave to file a motion to compel production of discovery and other appropriate sanctions.

The following discovery demands have not yet been responded to by the defendant: Plaintiff's Interrogatories to Defendant, served on December 10, 2007.

Plaintiff's Combined Demands, dated July 16, 2007, which were served on July 20, 2007 and were due on August 20, 2007.

Plaintiff's Notice for Discovery and Inspection, dated July 16, 2007, which were served on July 20, 2007 and were due on August 20, 2007.

Plaintiff is being particularly prejudiced by defendant's failure to provide aforementioned discovery, particularly since pursuant to Pretrial Scheduling Order, dated October 31, 2007 all fact discovery must be completed by February 29, 2008.

Very truly yours,

Nelly Stotland
Nelly Stotland, Esq.

2/25/08

Cc: Law Offices of James Bilello & Associates
875 Merrick Avenue
Westbury, New York 11590

*Counsel are requested to
meet and confer to resolve
any discovery disputes. In
the event the conference
fails to resolve all disputes,
plaintiffs may arrange a
joint conference call with
the Court on Wednesday,
2/27 at 3:00 pm. Denise Cote*